

**Federal Defenders  
OF NEW YORK, INC.**

Tamara L. Giwa  
*Executive Director*

Southern District  
52 Duane Street, 10<sup>th</sup> Floor  
New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

Jennifer L. Brown  
*Attorney-in-Charge*

October 15, 2024

**BY ECF**

The Honorable Richard M. Berman  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*MEMO ENDORSED*

**Re: United States v. Bonilla  
24 Cr 590 (RMB)**

Dear Judge Berman:

The defense writes with the consent of Pretrial Services to respectfully request the Court amend Mr. Bonilla's bail conditions to allow him to leave on Saturdays and Sundays from 2 PM to 8 PM (including travel time from the Bronx to Brooklyn) to visit his ill brother at the Rutland Nursing Home in Brooklyn. The Government defers to Pretrial. Thank you for the Court's consideration.

*The Court is not amending  
the current bail conditions  
at this time. Application  
denied without prejudice.*

cc: AUSA James Madilk, Esq.  
SO ORDERED: *Richard M. Berman*  
Date: 10/15/24 *Richard M. Berman*  
Richard M. Berman, U.S.D.J.

Respectfully submitted,

*/s/ *IAA**  
Ian Marcus Amelkin  
Assistant Federal Defender  
52 Duane Street, 10th Floor  
New York, NY 10007  
(212) 417-8733

DISCOVERY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: <u>10/15/24</u>